



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2  
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OCT 19 2004

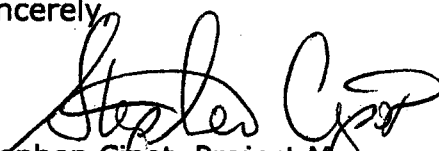
Mr. Anthony Cinque  
Case Manager  
Bureau of Federal Case Management  
New Jersey Department of Environmental Protection  
401 East State Street  
Trenton, NJ 08625

Re: L.E. Carpenter Superfund Site, Wharton, NJ. Review and comment on the document entitled, Response to Regulatory Comments on the Remedial Action Work Plan (RAWP), dated September 2004.

Dear Mr Cinque:

The U.S. Environmental Protection Agency (EPA) has completed its review and comment on document entitled, Response to Regulatory Comments on the Remedial Action Work Plan (RAWP), submitted by RMT Inc., dated September 2004, for the LE-Carpenter Superfund Site in Wharton Borough, New Jersey, and has attached comments. The document was submitted in response to EPA and New Jersey Department of Environmental Protection (NJDEP) Comment letters dated July 15, 2004, and July 21, 2004, respectively. If you have any questions or comments on this letter, please feel free to discuss them with me at (212) 637-4411, at your earliest convenience. Thank you for the opportunity to review the above submittal.

Sincerely,

  
Stephen Cipot, Project Manager  
Southern New Jersey Remediation Section

Enclosure

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**U.S. Environmental Protection Agency (EPA) comments on the document, Response to Regulatory Comments on the Remedial Action Work Plan, submitted by RMT, dated September 2004**

In general the responses contained in the above submittal address many of the EPA's concerns, however, several key differences remain which could have consequences on the long term effectiveness of the remedy.

1. Post-excavation foot/base samples are still not planned within the excavation areas, nor will the LNAPL soils be sampled (page 3 of 10, page 4 of 10). EPA strongly believes foot/base samples should be collected. Since the excavation depth is only to the top of the smear zone this can lead to leaving both heavily contaminated soils and LNAPL hot spot areas behind, which could then compromise the long term effectiveness of the remedy. It is prudent to collect foot/base samples during the presently planned remedial phase, rather than having to deal with remaining hot spots at a later time. Hot spots may also be difficult to locate without having any prior baseline soils samples to compare to. Moreover, since excavated material will be replaced by a concrete monolith, thus making future excavation of any hot spots or their remediation difficult. Collection of foot/base samples is of further a concern because RMT has proposed Monitored Natural Attenuation (MNA) as the sole follow-up remedial means of handling residuals contaminants, however, any potential remaining significant contamination that could be left in place after excavation might greatly impede MNA. If MNA were to be considered we would at a minimum need assurance that no significant source remains. That can only be done thru post-excavation sampling. We would rather know this information now so as to be better able to monitor and deal with potential MNA issues. MNA, it should further be noted, has not been proven to be an effective remedial measure at the site, and it is not the preferred remedial alternative at this time, contrary to the text (page 7 of 10).
2. The above applies to planning a sufficient number of both borings and collection of side wall samples (page 3 of 10, page 4 of 10), during the planned excavation remedial phase. As previously noted, EPA believes the proposed 35 foot spacing for the PCB area, 40 foot spacing for metals, and 50 foot for lead should be reduced so that approximately 15 to 20 percent more borings/samples locations can be obtained for confirmation to ensure remedial goals have been achieved, and that there will be no surprises or negative impacts to the long term effectiveness of the remedy. The NJDEP has requested that EPA use 30 foot sample grids, in accordance with NJDEP tech regs., at other Superfund sites. The EPA expects NJDEP would require that standard, at a minimum, here.

7. Rockaway River Issues (page 8 of 10). The text states that Rockaway River sediment sampling, hydraulics and water quality measurements will be collected in the Post Remedial Monitoring Network (Plan?), however, no schedule is proposed. Again, foot/base and side walls samples will be useful in the planning of Rockaway River sediment, hydraulics and water quality sampling. It should also be noted that significant excavation activities will be conducted adjacent to the river.
8. Expansion of Excavation (page 10 of 10). In order to remediate the LNAPL stringer that has been recently detected in the vicinity of MW-3, since the submission of the first remedial design plan in 2003, the text states that an additional .492 acres will be remediated down to the water table. The plan also includes remediating the area of the surficial seep that has been recently detected in the Air Products drainage ditch. However, text here also states that excavation in this area will be down to the water table. This seems to conflict with previous statements that the excavated area will be down to the seasonally low water table and into the smear zone below the water table. The excavations should be to the same depth as proposed for the lead and LNAPL excavation, so as to remove as much of the contamination as possible, in one remedial event.
9. The report states that the material from the newly outlined .492 acre area has been included in the volume and the trucking estimates that had been previously provided via email in June 2004 (which was not restated in the submittal), and that the township has been fully apprized of the potential traffic and noise issues. RMT must continue to keep the township and EPA apprized of site status and of any changes in volumes and trucking estimates, in a timely manner. Moreover, any disposal facility which is proposed to take site materials will need to be approved ahead of time by EPA, before wastes can be shipped off-site. The information provided in the request submitted to the EPA site project manager should include the name and address of the proposed facility; the RCRA permit number; date issued and its expiration date; and, the type of waste and volume.